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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF WYOMING**

In re:)
) Case No.: 16-20326
POWELL VALLEY HEALTH CARE,) Chapter 11
INC.,)
Debtor.)

**MOTION TO VACATE AND CONTINUE HEARING ON DEBTOR’S MOTION
FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTOR TO ASSUME
UNEXPIRED NON-RESIDENTIAL REAL PROPERTY LEASES PURSUANT
TO SECTION 365 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE
6006 AND (II) ESTABLISHING CURE AMOUNT AND THE OPPOSITION
THERE TO**

Powell Valley Health Care, Inc. (“PVHC”), Debtor, hereby files this motion to vacate and continue the hearing on Debtor’s *Motion for Entry of an Order (I) Authorizing the Debtor to Assume Unexpired Non-Residential Real Property Leases Pursuant to Section 365 of the Bankruptcy Code and Bankruptcy Rule 6006 and (II) Establishing Cure Amount* (the “Assumption Motion”) [D.E. 248] and the *Objection to Motion for Entry of an Order (I) Authorizing the Debtor to Assume Unexpired Non-Residential Real Property Leases Pursuant to Section 365 of the Bankruptcy Code and Bankruptcy Rule 6006 and (II) Establishing Cure Amount, and Request for Evidentiary Hearing* [D.E.

292] filed by the Official Committee of Unsecured Creditors (the “UCC”), and in support thereof shows the Court as follows:

1. On May 16, 2016 (the “Petition Date”), PVHC commenced this case (the “Chapter 11 Case”) by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Wyoming (the “Bankruptcy Court”).

2. PVHC has continued in the possession of its property and has continued to operate and manage its business as a debtor-in-possession pursuant to Bankruptcy Code §§ 1107 and 1108.

3. On June 21, 2016, the Office of the United States Trustee for Region 19 (the “U.S. Trustee”) appointed an official committee of unsecured creditors for the Chapter 11 Case (the “UCC”) [D.E. 145].

4. On August 18, 2016, PVHC filed its Assumption Motion.

5. On September 12, 2016, the UCC filed its opposition to the Assumption Motion.

6. Counsel for PVHC and the UCC have participated in discussions regarding, among other things, the Assumption Motion and the UCC’s opposition thereto. At this juncture, PVHC and the UCC have agreed that it is in all parties’ best interests to vacate and continue the hearing on the Assumption Motion and the UCC’s opposition thereto currently set for October 5, 2016, at 11:00 a.m., for a period of sixty (60) days

7. The Powell Hospital District has also agreed that the hearing should be continued.

WHEREFORE, PVHC respectfully requests that the Bankruptcy Court enter an order substantially in the form attached hereto at Exhibit A vacating and continuing the hearing on the Assumption Motion and the opposition thereto for at least sixty (60) days.

Dated: September 30, 2016
Cheyenne, Wyoming

MARKUS WILLIAMS YOUNG AND
ZIMMERMANN LLC

By: /s/ Bradley T. Hunsicker
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Counsel for the Debtor and Debtor-in-Possession

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, *electronically*, this 30th day of September, 2016, upon those parties listed below:

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/s/ Bradley T. Hunsicker

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